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Hearing Date: May 20, 2010  
Hearing Time: 10:00 a.m.  
Objection Deadline: May 13, 2010

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**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	:	Chapter 11
In re	:	
	:	Case No. 05-44481 (RDD)
DELPHI CORPORATION, <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors.	:	
	:	
	:	

**NOTICE OF MOTION BY METHODE ELECTRONICS, INC.  
FOR AN ORDER (I) PERMITTING METHODE TO CONTINUE  
POST-PETITION LITIGATION WITH THE REORGANIZED  
DEBTORS IN MICHIGAN AND (II) OVERRULING THE  
REORGANIZED DEBTORS' TIMELINESS OBJECTION  
TO METHODE'S ADMINISTRATIVE EXPENSE CLAIMS**

**PLEASE TAKE NOTICE** that Methode Electronics, Inc. ("Methode"), by and through its undersigned counsel, based on this notice of motion, the accompanying memorandum of law, the Declaration of Anne Marie Walsh, Esq. and other accompanying documents, hereby

moves for entry of an order, substantially in the form attached hereto as Exhibit A: (1) permitting Methode to continue pursuing post-petition litigation claims against DPH-DAS LLC and affiliated reorganized debtors (the “Reorganized Debtors”) in the state and federal courts of Michigan; and (2) overruling the objection of the Reorganized Debtors to Methode’s administrative expense claims to the extent the objection is predicated on the date when Methode filed certain claim forms with this Court (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Motion will be held on May 20, 2010 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”) before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), The Honorable Charles L. Briant Federal Building and Courthouse, 300 Quarropas Street, Courtroom 118, White Plains, New York 10601-4140.

**PLEASE TAKE FURTHER NOTICE** that answering papers, if any, in opposition to the relief requested shall be filed with the Court and served upon the undersigned counsel for Methode no later than May 13, 2010 at 5:00 p.m. (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Motion must be made in writing, conform to the Bankruptcy Rules and the Local Bankruptcy Rules for the Bankruptcy Court, and be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User’s Manual for the Electronic Case Filing System, which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format, and shall be served in accordance with General Order M-242, with a courtesy copy delivered to the Chambers

of the Honorable Robert D. Drain, United States Bankruptcy Judge, and served on Wachtell, Lipton, Rosen & Katz, attorneys for Methode, 51 West 52nd Street, New York, New York 10019, attn.: Douglas K. Mayer, in accordance with General Order M-182, so as to be received no later than the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that only those objections made as set forth herein will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: April 20, 2010  
New York, New York

**WACHTELL, LIPTON, ROSEN & KATZ**

/s/ Douglas K. Mayer  
Douglas K. Mayer  
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*Attorneys for Methode Electronics, Inc.*

## EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
	:	Case No. 05-44481 (RDD)
DELPHI CORPORATION, <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors.	:	
	:	
	:	

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**ORDER GRANTING THE MOTION OF METHODE ELECTRONICS, INC. FOR  
AN ORDER (I) PERMITTING METHODE TO CONTINUE POST-PETITION  
LITIGATION WITH THE REORGANIZED DEBTORS IN MICHIGAN AND  
(II) OVERRULING THE REORGANIZED DEBTORS' TIMELINESS  
OBJECTION TO METHODE'S ADMINISTRATIVE EXPENSE CLAIMS**

Upon the motion dated April 20, 2010 of Methode Electronics, Inc. ("Methode") for entry of an order (1) permitting Methode to continue pursuing post-petition litigation claims against DPH-DAS LLC and affiliated reorganized debtors (the "Reorganized Debtors") in the state and federal courts of Michigan, and (2) overruling the objection of the Reorganized Debtors to Methode's administrative expense claims to the extent the objection is predicated on the date when Methode filed certain claim forms with this Court (the "Motion"); and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Standing Order M-61 Referring to Bankruptcy Judges for the Southern District of New York Any and All Proceedings Under Title 11, dated July 10, 1984 (Ward, Acting C.J.); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and based upon all the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor:

**IT IS HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.

2. Nothing in this Court's July 30, 2009 Plan Modification Order [D.I. 18707] or any other order entered in these cases shall be construed as prohibiting Methode from continuing to pursue litigation in the state and federal courts of Michigan of any claims, rights, or defenses against the Reorganized Debtors, Delphi Automotive Systems LLC, Marian, Inc., or any other party in *DAS-DPH LLC v. Methode Electronics Inc.*, No. 08-095518-CK (Mich. Cir. Ct. Oakland County) and *Methode Electronics, Inc. v. DPH-DAS, LLC, et al.*, Nos. 09-cv-14303, 09-cv-13078 (E.D. Mich.).

3. The Reorganized Debtors' objections to Methode's administrative expense claims as untimely are overruled.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2010  
White Plains, New York

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE